

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

YITZCHAK SIMON, )  
 )  
Plaintiff, )  
 )  
v. ) Case No.  
 ) 4:23-cv-00955  
TISHAURA ONEDA JONES, )  
et al., )  
 )  
Defendants. )

DEPOSITION OF NANCY CROSS  
TAKEN ON BEHALF OF THE PLAINTIFF  
SEPTEMBER 25, 2024

1 or explained to you --

2 **A. No.**

3 Q. -- his outreach work?

4 **A. It was my understanding that his job at**  
5 **St. Patrick Center was his first job with the**  
6 **unhoused.**

7 Q. Okay. Have you ever heard of Tent  
8 Mission?

9 **A. Yes.**

10 Q. Okay. Do you know whether or not Mr.  
11 Simon had been involved with Tent Mission?

12 **A. I do not.**

13 Q. What is Tent Mission?

14 **A. It's a volunteer organization that**  
15 **works -- goes out and does outreach work with the**  
16 **unhoused.**

17 Q. Does the St. Louis City staff work with  
18 Tent Mission in any way?

19 **A. Not clear to me at this point.**

20 Q. Are you aware of any type of protests  
21 or demonstrations that Tent Mission has been  
22 involved in against the St. Louis City policies as  
23 they relate to the unhoused?

24 **A. Yes.**

25 Q. Okay. What are you aware of?

1           A.     That they've had a demonstration in  
2 front of city hall that they were part of, I believe  
3 it was organized by a different organization. And  
4 it was sometime in March of 2023.

5           Q.     During this decommissioning of the --

6           A.     No, in between.

7           Q.     Let me make sure I understand. You  
8 were aware in March of 2023 that Tent Mission  
9 participated in a demonstration in front of city  
10 hall in March of 2023?

11          A.     I can't answer that question the way  
12 it's worded.

13          Q.     Explain to me why.

14          A.     Because Tent Mission is an organization  
15 that is not -- is horizontally -- is a horizontal  
16 structure. So there are one or two people that I  
17 had interactions with from Tent Mission, but I don't  
18 know the scope of who they are or who actually is  
19 part of their organization.

20                   I know that there was another  
21 organization in town that led a demonstration from  
22 the riverfront to city hall, and if they were part  
23 of that, they were part of that. But to the best my  
24 knowledge it was not a Tent Mission sanctioned event  
25 for lack of a better term, like, accredited event.

1 Q. What was the other organization?

2 A. ArchCity Defenders.

3 Q. And it's your understanding that this  
4 demonstration was organized by ArchCity Defenders?

5 A. Yes.

6 Q. Okay. And explain to me everything you  
7 know about this demonstration?

8 A. I know that we had tried to  
9 decommission on March 10th, the activists prevented  
10 that from happening. It was at the end of the day,  
11 we decided not to continue that.

12 We had some conversations -- "we" being  
13 me, I should say, had some conversations about what  
14 we were trying to do and that we had housing and  
15 things for the people.

16 And then within a short period of time  
17 after that -- so if March 10th was a Friday or  
18 Thursday, the following week, and then there was a  
19 demonstration led by Blake Strode.

20 Q. Say -- Blake?

21 A. Blake Strode, S-t-r-o-d-e, who's the  
22 Executive Director of ArchCity Defenders. And there  
23 were probably other activists groups with them at  
24 that time.

25 Q. Okay. So let me back up here. You

1 motivation.

2 BY MS. BARTH:

3 Q. Okay. Have you ever had anyone tell  
4 you that some of these activists do not agree with  
5 these services that the city has alleged to provide  
6 for these unhoused people?

7 A. Yes.

8 Q. Okay. What have you been told that the  
9 activists disagree about whether or not these are  
10 appropriate services for these people at the  
11 encampment?

12 A. There are some activists that have said  
13 they don't want people to be put into shelters, that  
14 they want people to go into permanent housing right  
15 away.

16 There are some activists that say that  
17 we should have housing that allows people to -- very  
18 low barrier housing, which means that there are no  
19 rules around drugs, alcohol and weapons.

20 There are some that just believe  
21 also -- I don't know how much they're included in  
22 the group, but have said that people should be  
23 allowed to live in and just live and they're not  
24 necessarily doing any harm.

25 Q. So one of the things you said is they

1 don't want people to be put in shelters, is moving  
2 people from an encampment and into shelters a  
3 long-term solution to an unhoused person's problems?

4 **A. No, and it is not our long-term**  
5 **solution.**

6 Q. Okay. Is that one of the services you  
7 were providing to -- in other words, providing a  
8 shelter, is that one of the services that was being  
9 offered to the unhoused during this March 5th  
10 through March 10th decommissioning?

11 **A. Yes. Or it could be -- there's**  
12 **different forms. There's shelters, where everybody**  
13 **is in like a dormitory that they really don't like.**  
14 **And then there are shelters like Little Sisters**  
15 **Mission where you'd have your room and sometimes**  
16 **your own bathroom, or you might depending on the**  
17 **floor share a bathroom, but you're in a room of your**  
18 **own.**

19 Q. Okay. But you would agree with some of  
20 these activists that moving persons from an  
21 encampment to a shelter isn't necessarily a  
22 long-term solution to their unhoused issue?

23 **A. I agree it is not a long-term solution.**  
24 **And it is not the long-term solution of the city.**  
25 **It's the first step.**

1 Q. But is it accurate that some -- at  
2 least some of the unhoused that were at the  
3 encampment between March 1st and March 10th, moving  
4 them to a shelter was one of the services that the  
5 city had provided for them?

6 A. Yes.

7 Q. Okay. And so is it fair to say that  
8 some of these activists were actively disagreeing  
9 with the services that your city staff were  
10 providing to those persons at the encampment as far  
11 as whether or not they thought they was a reasonable  
12 solution?

13 MS. DUNCAN: I'm going to object to  
14 speculation. Subject to that, you can answer.

15 THE WITNESS: I'm sure there are some  
16 of them that don't agree.

17 BY MS. BARTH:

18 Q. Okay. And in general would you agree  
19 that -- how to deal with the unhoused population in  
20 the City of St. Louis is a political issue for the  
21 city and for certain activists in this area?

22 MS. DUNCAN: Object as vague. Subject  
23 to that, you can answer.

24 THE WITNESS: I don't know how to  
25 answer that.

1 BY MS. BARTH:

2 Q. You would agree that the mayor, you  
3 have heard, has made statements while she's been  
4 running for office about how to deal with the  
5 unhoused issue, correct?

6 A. I'd have to see it to recall exactly  
7 what she said, because I don't know that off the top  
8 of my head.

9 Q. Okay. Are you saying you are unaware  
10 of whether or not the unhoused issue in the City of  
11 St. Louis is an issue that politicians, such as the  
12 mayor, alderman and activists talk about and  
13 discuss?

14 A. I think it's an issue that they have  
15 discussed at some point.

16 Q. Okay. And in fact there's a whole city  
17 department that is related to the unhoused issue in  
18 the city?

19 A. Subdepartment, yes.

20 Q. Yes. It's a subdepartment but --

21 A. Of Human Services.

22 Q. Okay. But it is a department, correct?

23 A. Yes.

24 Q. Okay.

25 A. It's a division.



1 Q. It's a division, okay. And you know  
2 that there have been protests about how the city has  
3 handled the unhoused population in the City of St.  
4 Louis?

5 A. Correct.

6 Q. There have been multiple demonstrations  
7 about it, correct?

8 A. I only know of one -- two -- I only  
9 know of two.

10 Q. Okay. It has been the subject of --  
11 how the city is dealing with the unhoused population  
12 has been the subject of newspaper articles, correct?

13 A. Yes.

14 Q. Okay. And some persons disagree, some  
15 organizations that deal with the unhoused population  
16 disagree with how the city has dealt with the  
17 unhoused; is that correct?

18 A. Correct.

19 Q. Including under Mayor Jones's tenure,  
20 correct?

21 A. Correct.

22 Q. All right. So with that said, it's  
23 fair to say this is an issue that is discussed  
24 widely in the City of St. Louis in newspaper  
25 articles, activists demonstrations and within the

1 city government of St. Louis?

2 MS. DUNCAN: I'm going to object to  
3 speculation. Subject to that, you can answer.

4 THE WITNESS: And I don't agree.

5 BY MS. BARTH:

6 Q. So why don't you agree?

7 A. Because I don't think it's widely  
8 discussed in the form of -- in the way that you're  
9 describing.

10 Q. How would you describe it?

11 A. I would say that there are people that  
12 are concerned about the way that we -- the city  
13 administration is handling the unhoused issues.  
14 Some people have not moved off of the previous  
15 administration's position on unhoused. Some  
16 activists keep pointing back to something that  
17 happened before we got into office.

18 There are a lot of people in the city  
19 that want the unhoused to go away and be unseen.  
20 And so I don't believe that there are -- that  
21 everyone that's talking about this is talking about  
22 it in the way that you're trying to portray it.

23 Q. Okay. And what I was getting at before  
24 is just saying that it is a political issue, whether  
25 or not you agree with what the mayor has done, or

1 you disagree, it is a political issue within the  
2 City of St. Louis?

3 MS. DUNCAN: I'm going to object to the  
4 phrasing of that as vague. Subject to that, you can  
5 answer.

6 THE WITNESS: I would need you to  
7 define to me what you mean by "political".

8 BY MS. BARTH:

9 Q. An issue that is something that the  
10 mayor of St. Louis has to deal with?

11 A. Yes.

12 Q. Okay. And you went to law school, we  
13 talked about that earlier, right?

14 A. Uh-huh.

15 Q. You have a general idea of what the  
16 First Amendment is about, right?

17 A. Uh-huh.

18 Q. Would you agree if someone disagrees  
19 with how the city or the mayor is handling the  
20 unhoused population that is a matter that is  
21 protected by the First Amendment?

22 MS. DUNCAN: I'm going to object --

23 THE WITNESS: No.

24 MS. DUNCAN: -- legal conclusion.  
25 Subject to that, you can answer.

1 how the mayor of the City of St. Louis is handling  
2 an issue such as the unhoused population, your  
3 disagreement is something that is protected by the  
4 First Amendment?

5 MS. DUNCAN: Objection, legal  
6 conclusion. Subject to that, you can answer.

7 THE WITNESS: I would -- frankly, I  
8 would need you to tell me -- let me see the First  
9 Amendment.

10 BY MS. BARTH:

11 Q. You don't know what the First Amendment  
12 says?

13 A. I know what the First Amendment says to  
14 a degree, but I haven't been in law school in over  
15 35 years, so I am not comfortable answering a  
16 question where you're asking me --

17 Q. Okay.

18 A. -- to -- I know there's a list of  
19 things. I know it's freedom of speech, freedom of  
20 religion and --

21 Q. And I in particular am talking about  
22 the freedom of speech.

23 A. Okay. So ask your question again.

24 Q. Your ability to disagree with how the  
25 mayor or the City of St. Louis is handling the

1 unhoused situation is protected under your freedom  
2 of speech rights under the First Amendment?

3 MS. DUNCAN: Objection, legal  
4 conclusion. Subject to that, you can answer.

5 **THE WITNESS: I don't agree, so.**

6 BY MS. BARTH:

7 Q. Okay, you disagree. Okay. And you are  
8 the Director of Operations for the City of St. Louis  
9 --

10 **A. Correct --**

11 Q. -- and you disagree that statement?

12 **A. -- I am the Director of Operations for**  
13 **the City of St. Louis.**

14 Q. And you disagree with that last  
15 statement?

16 **A. The way you're asking the question is**  
17 **not helping me be able to answer it.**

18 Q. Okay. Well, explain to me what you  
19 understand a private citizen or any person can do  
20 that is protected by the First Amendment if they  
21 disagree with how the city or the mayor is handling  
22 the unhoused situation.

23 MS. DUNCAN: I'm going to object to  
24 legal conclusion. Subject to that, you can answer.

25 **THE WITNESS: So I mean people protest,**

1 they come in front of city hall, they send letters,  
2 e-mails, they call, things of that nature, and  
3 that's -- they have the right to do that.

4 BY MS. BARTH:

5 Q. Okay. Can persons disagree with city  
6 staff members while they are talking to populations  
7 of the unhoused --

8 MS. DUNCAN: Objection --

9 Q. -- is that protected by the First  
10 Amendment?

11 MS. DUNCAN: Objection, calls for a  
12 legal conclusion. Subject to that, you can answer.

13 **THE WITNESS: I feel like that is**  
14 **crossing a line and interfering with the staff**  
15 **people's ability to do the job that they were**  
16 **assigned to do.**

17 BY MS. BARTH:

18 Q. Okay. So let's go back through a  
19 couple of these things. One of the things that you  
20 talked about earlier was that you were informed that  
21 persons were encouraging the some of the unhoused to  
22 stay at the riverfront encampment, correct?

23 **A. Uh-huh.**

24 Q. Do you agree or disagree that  
25 encouraging unhoused members to stay at the

1 riverfront encampment is protected by the First  
2 Amendment?

3 MS. DUNCAN: Objection, calls for a  
4 legal conclusion.

5 **THE WITNESS: I disagree.**

6 BY MS. BARTH:

7 Q. You disagree, okay. And what is  
8 disagreement based upon?

9 A. That there was never anything cited as  
10 to them being upset with what the city was doing,  
11 that they were telling people that they could stay  
12 because they had the right to stay there. So  
13 they're giving advice, not protesting people having  
14 to leave.

15 Q. Okay. Do you agree or disagree that  
16 persons telling unhoused persons not to accept  
17 certain services that the city was offering, do you  
18 agree that form of speech is protected by the First  
19 Amendment?

20 MS. DUNCAN: Objection, legal  
21 conclusion. Subject to that, you can answer.

22 **THE WITNESS: I don't believe that is**  
23 **protected.**

24 BY MS. BARTH:

25 Q. Why?

1           **A.     Yep.**

2           Q.     -- from Christine Ingrassia?

3           **A.     Yes.**

4           Q.     And in March of 2023 who was Christine  
5 Ingrassia?

6           **A.     She was an alderwoman -- no -- that's**  
7 **what's getting me screwed up. She works for**  
8 **President Megan Green with the Board of Aldermen.**

9           Q.     She was no longer an elected alderman  
10 at that time?

11          **A.     Correct.**

12          Q.     She was --

13          **A.     She's the Operations Manager for their**  
14 **internal stuff.**

15          Q.     And her e-mail on March 6th, 2023,  
16 says: In anticipation of visiting the encampment  
17 and to prepare for her Wednesday morning meeting  
18 with Director Cross, President Green would like to  
19 have an understanding of any issues causing the  
20 timing of this eviction, whether any identified  
21 concerns were addressed with the residents of the  
22 encampment, what the plan is for rehousing  
23 individuals, what outreach has been done to date and  
24 if the city moves forward Friday how any belongings  
25 left behind will be handled --



1 e-mail.

2 Q. Okay. And did you bring material --  
3 information to that meeting on Wednesday?

4 A. Very little in writing. Mostly what I  
5 brought to them was the information to answer -- my  
6 ability to answer their questions as to what we were  
7 doing.

8 Q. When you say "very little in writing",  
9 does that mean you did take some stuff?

10 A. No. I talk across the table and tell  
11 them what we were doing.

12 Q. So when you said "very little in  
13 writing" what I'm asking you is was there any  
14 written material?

15 A. No.

16 Q. Okay.

17 A. Not that I recall.

18 Q. What do you recall occurring during  
19 this meeting?

20 A. They asked about it, we told them why  
21 the decision was made to do this, what the process  
22 had been, what we were doing, that we had -- what we  
23 had for preparations for rehousing the individuals,  
24 the outreach that had been done and where their  
25 belongings would be stored.

1 Q. Who did most of the talking on behalf  
2 of the city, yourself or Grace?

3 A. Me.

4 Q. Okay. Did anyone in particular do most  
5 of the talking on what you said the three other  
6 people, Christine, Megan or Jay?

7 A. I think a lot of it was Christine and  
8 Megan.

9 Q. Let's start with Cristine Ingrassia.  
10 Was she in favor of how the city was planning to  
11 decommission the riverfront encampment?

12 A. My opinion is she was not.

13 Q. Okay. What did she express to you that  
14 made you believe that she did not agree with how the  
15 city was planning to decommission the riverfront --

16 A. I don't --

17 Q. Hold on a minute. Riverfront  
18 encampment on March 10th, 2023?

19 A. I don't believe that she -- there was  
20 anything specific that I can recall that she said,  
21 it's just her general demeanor at the meeting.

22 Q. And how would you describe her general  
23 demeanor?

24 A. She had a concern over how the unhoused  
25 people were being removed from -- in her words, from

1 Q. Do you know what Mr. Scoggin meant by  
2 "partner organizations funded by the City of St.  
3 Louis"?

4 A. So we get funding -- we had ARPA  
5 funding, we had COVID funding at some point and we  
6 get funding from HUD for helping homeless people.

7 And we do -- and our fee process to  
8 award bids to particular organizations, depending on  
9 the criteria, and those become our partners. They  
10 tend to be people that -- we're partnering with  
11 people that want to find a long-term cure -- not  
12 cure, but a long-term solution to unhoused issues,  
13 not just get money from the city.

14 Q. Okay. And is it a fair summary to say  
15 that the city is kind of the holding place of those  
16 funds that then get disbursed to --

17 A. Yes.

18 Q. -- those types of organizations?

19 A. Yes.

20 Q. And was St. Patrick's one of those  
21 organizations that was at least partially funded by  
22 those types of funds by the City of St. Louis?

23 A. They get a variety of funds from the  
24 City of St. Louis.

25 Q. Okay. I'm going to the next paragraph:

1           **A.     Yes.**

2           Q.     And then at the bottom-ish it says:  
3 List of clients that we attempted to engage and they  
4 refused services at The Landing, given bus tickets  
5 to go to their choice of housing; do you see that?

6           **A.     Yes.**

7           Q.     And then on the page here there's  
8 someone named Nick Desideri?

9           **A.     Yes.**

10          Q.     Who is that?

11          **A.     He was the Communications Director for**  
12 **the mayor's office.**

13          Q.     Okay. I'm trying to understand, is  
14 this an e-mail from Nick to you?

15          **A.     It's from me to Nick. So what it is is**  
16 **that Nick -- there were two Nicks -- Nick Dunne, who**  
17 **was assigned to DHS as a communications person, and**  
18 **Nick Desideri that was his manager.**

19                 Dunne was out. Desideri was getting  
20 questions -- the same questions over and over again.  
21 And I responded that we've already answered these  
22 questions and we need to start trying to come up  
23 with feeding into the bad information, that we need  
24 to give the information we have and that's the  
25 information that's attached here, so.

1 Q. Okay. So let me make sure I understand  
2 this. When you say we were getting the same  
3 questions over and over again, what are you  
4 referring to?

5 A. Press.

6 Q. And what do you consider the press?

7 A. It would have been whatever newspaper  
8 or reporters are calling, those two on a regular  
9 basis.

10 Q. Okay. And when you say you were  
11 getting the same question over and again, what type  
12 of questions were you getting?

13 A. We would get: How many people were at  
14 the encampment, how many people were housed, how  
15 many people didn't get housed, when were they  
16 housed, where were they housed, how long is the  
17 housing for and a series of questions along those  
18 lines, depending on who the reporter is and how  
19 in-depth they want to go.

20 Q. And it was related to this March 10th  
21 decommissioning?

22 A. I'm assuming, yes.

23 Q. Okay. Because this is --

24 A. March 21st.

25 Q. -- this e-mail is March 21st, before

1 that was the second event at the decommissioning of  
2 the riverfront encampment, correct?

3 **A. Correct.**

4 Q. And why was it necessary to have a  
5 second decommission?

6 **A. Because there had been activity and**  
7 **people back down at that location and that was not a**  
8 **safe place for people to be.**

9 Q. Do you know whether or not  
10 Mr. Scoggin's office prior to the March 27th event  
11 had any conversations, planning, preparing for that  
12 event with St. Patrick Center?

13 **A. I am not aware of that -- or I do not**  
14 **know.**

15 Q. What involvement did you have on  
16 March 27th at the decommissioning?

17 **A. I was not at the site because I had --**  
18 **I forget, there was something else going on that**  
19 **day. We made sure that they had the -- what they**  
20 **needed as far as bags for people who wanted to take**  
21 **stuff with them, the ability for their stuff to be**  
22 **put in storage, where it was going to go, and people**  
23 **to clean up the needles and other paraphernalia once**  
24 **people were moved out.**

25 Q. When did you personally get involved in

1 alerted the chief of staff and the mayor that there  
2 were -- and the communications people that there  
3 were some issues happening with that  
4 decommissioning, and I wasn't sure it was going to  
5 be completed, and that there was a -- we were having  
6 activists interfering in our ability to move people.

7 Q. And again, when you talk about  
8 interfering in your ability to move people it's all  
9 those things we talked about before?

10 A. Uh-huh.

11 Q. Okay. So what did you after that,  
12 after you informed the chief of staff and mayor?

13 A. I didn't do anything at that particular  
14 moment. The mayor said she would like to call  
15 D'Agostino and talk to him about what was going on,  
16 so she made a phone call and he did not pick up.

17 He then called me, and she was with me,  
18 and she and I proceeded to have a conversation with  
19 him about the behavior of his staff person and the  
20 work -- what we were trying to do, and how we  
21 thought we had an understanding that we were all  
22 moving in the same direction.

23 Q. What did you or the mayor say to  
24 Mr. D'Agostino specifically?

25 A. That he had a staff person down there

1 that it wasn't -- that -- it's not specifically, but  
2 the gist of it was he had a staff person down there  
3 who was interfering with our ability to move people.  
4 We thought we had an understanding that we were all  
5 trying to move people into shelters and housing. We  
6 had facilities for people and that he was in the --  
7 his staff person was not living up to what the St.  
8 Patrick's mission was.

9 Q. Would this phone call have been in the  
10 morning?

11 A. It was probably around noon-ish.

12 Q. All right. Does it refresh your  
13 recollection that the first phone call between you  
14 and Mr. D'Agostino was sometime around 10:00 a.m.?

15 A. No.

16 Q. Okay. You don't think that happened?

17 A. It might have happened, I don't -- you  
18 asked me if it refreshed me, I'm not -- I usually  
19 have a standing 10 o'clock meeting with the health  
20 director, so.

21 Q. So during the first phone call that you  
22 and the mayor had with Mr. D'Agostino did you  
23 discuss the funding of St. Patrick Center?

24 A. Not that I recall.

25 Q. Okay. Did you have a second phone call



1   **This staff person was trying to again stop people**  
2   **from taking the services and moving to a different**  
3   **location, which would provide them with housing.**

4           Q.    Okay. That was your position. What  
5   was Mr. D'Agostino's position?

6           A.    He didn't necessarily disagree, but he  
7   added that he had checked and Mr. Simon was on a  
8   vacation day.

9           Q.    And so was not down at the riverfront  
10   encampment actually working for St. Patrick Center?

11          A.    Allegedly, right.

12          Q.    Well, what do you mean by "allegedly",  
13   you didn't believe Mr. D'Agostino?

14          A.    It's not a matter of believing. They  
15   agreed to a certain mission and how their staff was  
16   going to work with us, and this person whether he  
17   was there as a volunteer or not, was not holding up  
18   what they had had conversations with Yusef Scoggin  
19   about.

20          Q.    And what was your purpose in making  
21   this phone call to Mr. D'Agostino?

22          A.    To have Mr. Simon pulled back and not  
23   continue.

24          Q.    Pulled back in what way?

25          A.    Have him leave the riverfront and let

1 us do the work that we were doing.

2 Q. I thought you said this phone call  
3 happened late Friday or early Monday?

4 A. Okay. The late Friday, early Monday  
5 was he called me again, I know he's not on the  
6 company time and everything. And he said they were  
7 going look into it and they would do some kind of  
8 discipline and they were going to do what they  
9 needed to do.

10 At some point, I don't know which day  
11 it was that he and I talked, I suggested that since  
12 Mr. Simon had not been there for a long time that  
13 they use this as a teaching experience, that they  
14 not terminate him, that they figure out how to have  
15 some conversations with him about what the  
16 expectations were with people that worked for St.  
17 Patrick's and what their expectations were to be  
18 working with us.

19 Q. So you claim that you told  
20 Mr. D'Agostino not to terminate?

21 A. I definitely told him not to terminate  
22 him.

23 Q. How did the issue of termination come  
24 up?

25 A. He said they were going to look into it

1 were correct in telling Mr. D'Agostino what he  
2 should tell one of his employees to do? What gave  
3 you that authority?

4 **A. It's kind of who I am, and that I'm**  
5 **trying to get something accomplished, and he is**  
6 **interfering with the work we're trying to do on**  
7 **behalf of unhoused people, and that he should not be**  
8 **interfering in that work.**

9 Q. Would you agree that Mr. D'Agostino  
10 could have said, No, I'm not telling him to leave?

11 **A. Yes.**

12 Q. Okay. At some point do you remember  
13 calling Mr. D'Agostino later in the day and telling  
14 him that you believe Mr. Simon had returned to the  
15 encampment and was creating more problems?

16 **A. Yes.**

17 Q. Okay. And what was your information  
18 based upon?

19 **A. Photographs that were sent to me by the**  
20 **outreach worker. Richard Dixon in particular.**

21 Q. Okay.

22 **A. That he never actually left, so.**

23 Q. And do you specifically recall having  
24 -- after March 27th, 2023, do you specifically  
25 recall having additional conversations with

1 with Yusef, the captain of the police, the Refuse  
2 Department and Forestry Department. She was not  
3 involved in those conversations.

4 Q. And that's what she was upset about?

5 A. Yes.

6 Q. So looking at this After Action Agenda,  
7 Topic: Encampments, based upon what we've talked  
8 about, is it fair to say that an After Action  
9 meeting -- this wasn't a regularly scheduled  
10 meeting?

11 A. This was the only one that ever  
12 happened.

13 Q. Okay. And you'll see it says: Ground  
14 Rules, mutual respect for colleagues, avoid personal  
15 attacks. Our goal is to protect the integrity of  
16 the mayor and city government; do you see that?

17 A. Yes.

18 Q. Okay. Do you know -- and if you don't,  
19 that's fine. Do you know what that's talking about:  
20 Our goal is to protect the integrity of the mayor  
21 and city government?

22 A. No, that's not wording or -- that's a  
23 Sara Baker thing.

24 Q. Okay. Framing Questions, regarding the  
25 riverfront: What was our goal, what did we expect

## CERTIFICATE OF REPORTER

STATE OF MISSOURI     )  
                                      ) ss.  
CITY OF ST. LOUIS     )

I, Ashley C. Huelmann, a Certified Court Reporter (MO), Certified Shorthand Reporter (IL), Registered Professional Reporter, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me pursuant to Section 492.010 RSMo; that the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.



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Certified Court Reporter  
within and for the State of Missouri